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November 8, 2021

Hon. Paul G. Gardephe
United States District Court
U. S. Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Bernardi, et al.
21 Cr. 616 (PGG)

Dear Judge Gardephe:

I am the CJA attorney assigned to represent defendant **Sunil Chandra** one of the defendants in the above-referenced case. Mr. Chandra, a resident of Virginia, was arrested by the FBI on October 20, 2021 and initially presented in the Eastern District of Virginia (Alexandria division) and released on an appearance bond. Subsequently, Mr. Chandra was presented in this District on November 4, 2021 and continued at liberty. The S.D.N.Y. provides for a \$125,000.00 PRB to be cosigned by one financially responsible individual and one person to serve as moral suasion. Such signatures must be entered on the bond by November 29, 2021. Among the other conditions set forth in the S.D.N.Y. appearance bond are travel restrictions to certain counties in the Eastern District of Virginia as well as the Southern and Eastern Districts of New York for court and attorney visits and points in between for travel purposes.

I write today, with the consent of the United States Attorney's Office for the Southern District of New York (A.U.S.A. Peter Davis, Esq.) and Courtney DeFeo, S.D.N.Y. Pre-trial Services Officer, for a modification of the travel restriction part of the appearance bond.

It is respectfully requested that a modification of the bond be approved such as to allow Mr. Chandra travel privileges throughout the state of Virginia and Washington, D.C. Mr. Chandra, age 80 with no prior criminal history, does his everyday shopping and personal needs travel to Virginia counties to the west of his suburban residence as well as in Washington, DC proper. In fact he will be taking Amtrak from Washington, D.C. on November 10, 2021 for the conference before Your Honor that afternoon.

Accordingly, it is respectfully requested that the Court grant this modification request with all other conditions of his appearance bond to remain in effect.

Thank you for your consideration.


Respectfully submitted,


Richard H. Rosenberg

cc.: A.U.S.A. Peter Davis
Courtney DeFeo, Pre-Trial Services

Memo Endorsed: The application is granted.

SO ORDERED.


Paul G. Gardephe, U.S.D.J.
Dated: November 9, 2021